

July 5, 2005

Regulatory Analysis and Development, PPD, APHIS
Station 3C71
4700 River Road, unit 118
Riverdale, MD 20737-1238

RE: DOCKET 05-015-1: NATIONAL ANIMAL IDENTIFICATION SYSTEM

To Whom It May Concern:

On behalf of the many livestock producers of the 62,500 member families of the Idaho Farm Bureau Federation (IFBF), I am offering comments regarding the Draft Strategic Plan and Draft Program Standards of the National Animal Identification System (NAIS).

With recent discoveries in the United States of bovine spongiform encephalopathy (BSE) in cattle originating in Canada and one recently discovered in a cow originating in the U.S., it is extremely important that we have in place a program that will allow us the ability to track an animal's movements back to its place of origin in a timely manner. The safety of our nation's food supply and the security of our position in foreign markets depend on many safeguards that allow us to detect and prevent the spread of diseases and pathogens harmful to the human consumer. These safeguards are also needed to help alleviate the threat of terrorism related tampering of our food supply.

IFBF supports the concept of NAIS as well as both the Draft Strategic Plan and the Draft Program Standard. IFBF policy #164 states, "We support procedures and/or equipment being developed for the national ID program to be species specific, while allowing for universal factors for those producers with multiple animal species." The American Farm Bureau Federation (AFBF) is also in support of NAIS. AFBF policy states, "We support the establishment and implementation of a national animal identification system capable of providing support for animal disease control and eradication, as well as enhancing food safety."

IFBF would like to see the state of Idaho retain the practice of livestock branding as a sufficient tool for animal identification, but also encourages the development of new and effective animal identification methods. According to IFBF policy #160, "We support research into alternative methods of permanent livestock identification and ask that the brand department be authorized to recognize these methods." Our policy is consistent with AFBF policy, which states, "Any new method of livestock identification should only be considered if it is proven equally practical and effective as current methods and is a legally recognized form of proof of ownership in all states having livestock brand laws."

IFBF believes that it is important that a national program begin as an animal health driven program. Once the program is established across the country and is proven to be effective, IFBF supports the program's evolution into a market driven system to help the U.S. compete globally as we have in the past. The closing off of the U.S./ Canadian border by the U.S., and the U.S. beef ban imposed by many Asian and other international markets has allowed for countries like Australia, with an established national animal ID system to dominate those markets and has forced Canada to begin building their own packing facilities, instead of shipping Canadian cattle to the U.S. for slaughter. To lessen the volatility of the U.S. beef industry, an effective animal ID system could help the U.S. re-enter many foreign markets.

IFBF policy, consistent with AFBF policy supports the following guidelines for a livestock identification program:

- 1) The program should be simple and inexpensive for producers to implement.
- 2) Cost sharing support from the federal government, especially for development and implementation.
- 3) Producer information should be kept confidential and exempt from disclosure under the Freedom of Information Act (FAIA).
- 4) Information shall be made available only to the proper animal health authorities in the event of an animal disease incident.
- 5) The identification of animals will not be required until movement from the original registered premise.
- 6) All imported animals should be permanently identified regarding their country of origin upon entry to the untied states.

Thank you for the opportunity to comment on the development of this important program.

Sincerely,

Frank Priestley, President
Idaho Farm Bureau Federation